

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA**

In re: BDC GROUP, INC., Debtor.	Chapter 11 Case No. 23-00484 Hon. Thad J. Collins COMMITTEE’S REQUEST FOR EXPEDITED TELEPHONIC HEARING ON MOTION TO CONTINUE EVIDENTIARY HEARING (ECF NO. 258) (EXPEDITED RELIEF REQUESTED)
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The Official Committee of Unsecured Creditors (the “Committee”) of BDC Group, Inc. (the “Debtor”), pursuant to Local Rule 9073-2 hereby moves the Court to set its Motion To Continue Evidentiary Hearing (“Motion To Continue”) on an expedited schedule, and in support thereof states the following:

1. Simultaneously herewith, the Committee filed the Motion To Continue and a supporting declaration from Elizabeth J. Janczak, Esq.
2. As the Debtor’s and Keystone Savings Bank’s (“KSB”) Joint Motion for Relief from Automatic Stay (ECF No. 209) (“Relief From Stay Motion”) is currently set for an evidentiary hearing on October 26, 2023, the Committee requests the Court set an expedited hearing on the Motion To Continue prior to October 26, 2023.
3. As discussed in the Motion To Continue, there is good cause for the Motion To Continue and good cause for the Court to set an expedited hearing thereon.
4. The Committee respectfully requests the Court set the Motion To Continue for a hearing as soon as reasonable practicable and before October 26, 2023, if possible with the Court’s

calendar, and respectfully requests the Court enter an Order continuing the October 26, 2023 evidentiary hearing on the Relief From Stay Motion.

5. All parties directly impacted by this Motion for Expedited Hearing, Motion to Continue, and Relief From Stay Motion, consisting of the Debtor, KSB, and the U.S. Trustee, will receive electronic notice of this motion.

WHEREFORE, the Committee requests that the Court grant its Motion for Expedited Hearing; set the identified Motion To Continue for hearing before October 26, 2023, and grant any other relief that is appropriate.

Dated: October 19, 2023

SMITH GAMBRELL & RUSSELL LLP

By: /s/ Elizabeth L. Janczak
One of Its Attorneys

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 19, 2023, the *Committee's Request for Expedited Telephonic Hearing on Motion To Continue Evidentiary Hearing (ECF No. 258)* was served electronically upon those parties receiving electronic notification through the Court's CM/ECF system.

_____/s/ Elizabeth L. Janczak